

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

In re:	)	Chapter 11
	)	
<b>BK RACING, LLC,</b>	)	Case No. 18-30241
	)	
Debtor.	)	
	)	
	)	
<b>MATTHEW W. SMITH, Chapter 11</b>	)	
<b>Trustee for BK Racing, LLC</b>	)	
	)	Adv. Pro. No. 20-03014
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>RONALD C. DEVINE, BRENDA S.</b>	)	
<b>DEVINE, CARROLL E. DEVINE,</b>	)	
<b>RANDALL DEVINE</b>	)	
<b>2010 IRREVOCABLE TRUST,</b>	)	
<b>CHRISTOPHER DEVINE 2010</b>	)	
<b>IRREVOCABLE TRUST,</b>	)	
<b>BENJAMIN DEVINE 2010</b>	)	
<b>IRREVOCABLE</b>	)	
<b>TRUST, BRC LOANS, LLC, BRC REAL</b>	)	
<b>ESTATE HOLDINGS, LLC, A&amp;R FOODS,</b>	)	
<b>INC., VIRGINIA RACERS GROUP, LLC,</b>	)	
<b>PROPERTY SERVICES, INC., US</b>	)	
<b>FINANCIAL COMPANIES, LLC, and</b>	)	
<b>DEVINE FAMILY FOUNDATION,</b>	)	
<b>Defendants.</b>	)	
	)	

**EX PARTE MOTION FOR EXTENSION OF TIME**

**NOW COMES** the above-captioned defendants Ronald C. Devine, *et al.* (collectively, the “Defendants”), by and through counsel, requests an extension of time up through and including May 14, 2020 for the purpose to respond to Plaintiff’s Complaint. The undersigned has consulted with Plaintiff’s counsel who has no objection to the relief requested.

**WHEREFORE**, Defendants pray the Court for an extension of time within which the Defendant may respond to Plaintiff's Complaint up to and including May 14, 2020.

Dated: Charlotte, North Carolina  
April 30, 2020

**ESSEX RICHARDS, P.A.**

/s/ John C. Woodman

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of April, 2020, the foregoing *EX PARTE* MOTION FOR EXTENSION OF TIME was served by electronic notification on those parties registered with the United States Bankruptcy Court's CM/ECF system to receive notices for this case.

Dated: Charlotte, North Carolina  
April 30, 2020

**ESSEX RICHARDS, P.A.**

/s/ John C. Woodman  
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